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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NOETIC SPECIALTY INSURANCE)
COMPANY,)
)
Plaintiff,)
)
v.)
)
O'MARA LAW FIRM, P.C., a Nevada)
Professional Corporation; DAVID O'MARA, a)
individual; EDWARD C. WOOLEY and)
JUDITH WOOLEY, individually and as trustee)
of the EDWARD C. WOOLEY and JUDITH)
WOOLEY INTERVIVOS REVOCABLE)
TRUST 2000; LARRY J. WILLARD,)
individually and as trustee of the LARRY)
JAMES WILLARD TRUST FUND;)
OVERLAND DEVELOPMENT)
CORPORATION, a California Corporation,)
)
Defendants.)

Case No.: 3:20-cv-00110-LRH-EJY

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO THE
COMPLAINT**

(FIRST REQUEST)

Plaintiff NOETIC SPECIALTY INSURANCE COMPANY, by and through its counsel of record Sheri Thome, Esq., and Defendants O'MARA LAW FIRM, P.C. and DAVID O'MARA (collectively "O'MARA"), by and through their counsel of record, Patrick R. Leverty, Esq., and Defendants EDWARD C. WOOLEY and JUDITH WOOLEY, individually and as trustee of the EDWARD C. WOOLEY and JUDITH WOOLEY INTERVIVOS REVOCABLE TRUST 2000 (collectively "WOOLEY"), by and through their counsel of record, Carl Hebert, Esq., stipulate that O'MARA and WOOLEY shall have up to and including **May 18, 2020**, to respond to the Plaintiff's Complaint.

Counsel for the O'MARA Defendants signed acceptances of service of process on March 3, 2020 (Doc 16 and 17). Accordingly, the O'MARA Defendants response to the Complaint was originally due on Friday, April 17, 2020.

Counsel for the WOOLEY Defendants signed acceptances of service of process on March 18, 2020 (Doc 18-21). Accordingly, the WOOLEY Defendants response to the Complaint was originally due on Monday, April 27, 2020.

Both the O'MARA Defendants and the WOOLEY Defendants requested an extension of time to file responses to the Complaint given the Covid-19 shutdown and the parties attempts to set up a settlement conference in the underlying case. Plaintiff graciously agreed Defendants O'MARA and WOOLEY can have up to and including **May 18, 2020**, to respond to the Plaintiff's Complaint.

This is the first requested extension.

DATED this 16th day of April, 2020.

DATED this 16th day of April, 2020.

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

LEVERTY & ASSOCIATES LAW CHTD.

/S/ Sheri Thome
Sheri Thome, Esq.
300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
*Attorneys for Plaintiff Noetic Specialty
Insurance Company*

/S/ Patrick Leverty
Patrick R. Leverty
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P.C. and David O'Mara*

DATED this 17th day of April, 2020.

CARL M. HEBERT

/S/ Carl Hebert
Carl M. Hebert, Esq.
202 California Avenue
Reno, NV 89509
*Attorneys for Defendants Edward C. Wooley
and Judith Wooley, Individually and as Trustee
of the Edward C. Wooley and Judith Wooley
Intervivos Revocable Trust 2000*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 17, 2020.